	Shaughnessy No: 005101
·	Date Out of EAB: FEB 2 4 1967
To: R. Taylor Product Manager #25 Registration Division (TS-767)	
From: James Adams Ph.D, Acting Chief Environmental Chemistry Review S Exposure Assessment Branch Hazard Evaluation Division TS-	
Attached, please find the EAB review of	f:
Reg./File # : 464-323	
Chemical Name: PICLORAM	
Type Product : Fynicicine	
Product Name : TORDON 22K	
Company Name : DOW CHEMICAL COMPANY	
Purpose : Amend label to include	e non-cropland use.
Date In: 05-06-85	Action Code: 300
Date Completed: 2-06-87	EAB #(s) : 5588
	Reviewing Time: 1.0
Deferrals to:	
Ecological Effects Branch	
Residue Chemistry Branch	
Toxicology Branch	
Monitoring study requested by EAB: / Monitoring study voluntarily conducted	// d by registrant: ///

20C)

. 1. CHEMICAL:

Common name-

Picloram Chemical name-4-amino-3,5,6-trichloro-

picolinic acid

Trade name(s)-Tordon 22K

Structure-

NH₂

2. TEST MATERIAL:

none

3. STUDY/ACTION TYPE:

> Dow Chemical Company has submitted amended sections of TORDON 22K label to be included in the new label to extend its use to non-cropland.

STUDY IDENTIFICATION:

No study was submitted with the amended label.

5. REVIEWED BY:

> Alan N. Evans Chemist EAB/HED/OPP

Signature

Date:

APPROVED BY: 6. James Adams, Ph.D. (Acting) Chief Section 1 EAB/HED/OPP

Signature:

mes & adams

Date:

7. CONCLUSION:

11 4:20.00

The attached contain Dow's proposed label for non-cropland use of picloram. See recommendations for EAB comments.

8. RECOMMENDATION:

EAB has read the amended items to be included on the label of TORDON 22K, but can not concur with the expanded use. In a previous review dated May 29,1984, EAB did not concur with the expanded use west of the Mississippi because expanding its use would be a significant incremental risk to the environment. EAB recommends that a revised label is needed to specify the specific geographic areas. Also, as per the April 24,1980 letter of Robert Taylor (PM), field dissipation studies from representative rangeland areas of the west are required.

9. BACKGROUND:

A. Introduction

Tordon 22K is a fungicide that will be used to control susceptible broadleaf weeds and woody plants on rangeland and permanent grass pastures and non-cropland areas west of the Mississippi river.

B. Directions for use

See enclosed label.

10. DISCUSSION OF STUDY:

Not applicable. No study was submitted.

11. COMPLETION OF ONE-LINER:

Not applicable.

12. CONFIDENTIAL APPENDIX:

No CBI included.

NON